# UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO

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In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,	PROMESA Title III
as representative of	No. 17 BK 3283-LTS
THE COMMONWEALTH OF PUERTO RICO, et al.,	(Jointly Administered)
Debtors. <sup>1</sup>	
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# NOTICE OF AGENDA OF MATTERS SCHEDULED FOR THE HEARING ON OCTOBER 30-31, 2019 AT 9:30 A.M. $AST^2$

Time and Date of Wednesday, October 30, 2019, from 9:30 a.m. to 12:00 p.m.,

from 9:30 a.m. to 12:00 p.m., from 1:00 p.m. to 5:00 p.m.,

and, if necessary,

Thursday, October 31, 2019, from 9:30 a.m. to 12:00 p.m., (Atlantic Standard Time)

**Location of Hearing:** Honorable Laura Taylor Swain, United States District Court Judge

Honorable Judith G. Dein, United States Magistrate Judge

**Courtroom 3** 

United States District Court for the District of Puerto Rico,

Clemente Ruiz Nazario United States Courthouse,

150 Carlos Chardón Avenue, San Juan, P.R. 00918-1767

The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>&</sup>lt;sup>2</sup> Attendees should note that daylight savings time went into effect on March 9, 2019. As such, the hearing will take place at 9:30 a.m. Atlantic Standard Time, which is also 9:30 a.m. Eastern Standard Time, on October 30-31, 2019.

<u>Video Teleconference</u>: The hearing will be broadcast by <u>video</u> teleconference in Courtroom <u>17C</u><sup>3</sup> of the United States District Court for the Southern District of New York, **Daniel Patrick Moynihan** Courthouse, 500 Pearl Street, New York, NY 10007

# **Copies of Documents:**

Copies of all documents filed in these Title III cases are available free of charge (a) by visiting <a href="https://cases.primeclerk.com/puertorico">https://cases.primeclerk.com/puertorico</a> or by calling +1 (844) 822-9231, and (b) on the Court's website at <a href="http://www.prd.uscourts.gov">http://www.prd.uscourts.gov</a>, subject to the procedures and fees set forth therein.

# I. STATUS REPORTS:

## 1. Report from the Oversight Board.

<u>Description</u>: The Financial Oversight and Management Board for Puerto Rico (the "<u>FOMB</u>" or "<u>Oversight Board</u>") will report on (i) the general status and activities of the Oversight Board; (ii) the status of the reformulation of Debtors' ADR proposal; (iii) the status of PRIDCO's RSA and anticipated Title VI filing; and (iv) the general status of relations among the Oversight Board and the Commonwealth and federal governments.

# 2. Report from AAFAF.

<u>Description:</u> The Puerto Rico Fiscal Agency and Financial Advisory Authority ("<u>AAFAF</u>") will provide a general status report on its status and activities.

# II. <u>FEE APPLICATIONS</u>:

1. Report from the Fee Examiner regarding (I) COFINA Final Fee Applications, (II) Sixth Interim Fee Applications and Certain Prior Compensation Periods, and (III) Report and Recommendations Regarding Fee Review Process for McKinsey & Co., Inc.

<u>Description</u>: The Fee Examiner, Brady C. Williamson, will present his recommendations regarding (i) COFINA Final Fee Applications for allowance of compensation and reimbursement of expenses; (ii) Sixth Interim Fee Applications for allowance of compensation and reimbursement of expenses; (iii) Certain Prior Interim Fee Applications for allowance of compensation and reimbursement of expenses submitted by professionals listed below; and (iv) Report and Recommendations Regarding Fee Review Process for McKinsey & Co., Inc.

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<sup>&</sup>lt;sup>3</sup> Attendees should check the notice board in the lobby of the <u>New York</u> courthouse on the morning of the hearing to confirm the courtroom location.

	COFINA FINAL FEE APPLICATIONS				
	Applicant	Docket No.	Period		
1.	Alvarez & Marsal – Advisor FOMB – COFINA	5791 / 625	08/09/2018 —		
		(17-3284)	02/12/2019		
2.	Klee Tuchin Bofdanoff & Stern LLP – Special Municipal	7410	07/31/2017 -		
	Bankruptcy Counsel for COFINA Agent		02/12/2019		
3.	Nilda M. Navarro-Cabrer – Puerto Rico Counsel for COFINA	7412	08/16/2017 -		
	Agent		02/12/2019		
4.	Bettina Whyte – COFINA Agent	7408	08/03/2017 -		
			02/12/2019		
5.	Willkie Farr & Gallagher, LLP – Counsel to COFINA Agent	7409	08/03/2017 -		
			02/12/2019		
	<u>FIFTH INTERIM PERIOD</u>				
	Applicant	Docket No.	Period		
6.	Conway MacKenzie – Financial Advisors to Commonwealth	7439	11/1/2018 -		
	•		02/28/2019		
7.	Klee Tuchin Bofdanoff & Stern LLP – Special Municipal	5783	10/01/2018 -		
	Bankruptcy Counsel for COFINA Agent		02/12/2019		
8.	McKinsey & Company, Inc. – Consulting Services Provider	5802 / 1132	10/01/2018 -		
	to FOMB – PREPA	(17-4780)	01/31/2019		
9.	McKinsey & Company, Inc. – Consulting Services Provider	5804	10/01/2018 -		
	to FOMB – Commonwealth		01/31/2019		
10.	McKinsey & Company, Inc. – Consulting Services Provider	5805 / 543	10/01/2018 -		
	to FOMB – HTA	(17-3567)	01/31/2019		
11.	O'Neill & Borges LLC – Puerto Rico Counsel to FOMB	6296	10/01/2018 -		
111	o i veni ee Beigee BBe i welle i late ee waar te i e i ib	0200	01/31/2019		
SIXTH INTERIM PERIOD					
	A124	Daalast Na	D		
	Applicant	Docket No.	Period		
12.	Alvarez & Marsal North America, LLC – Advisor to FOMB –	7892	02/01/2019 —		
	Commonwealth		05/31/2019		
13.	,	7988 / 650	02/01/2019 —		
	ERS	(17-3566)	05/31/2019		
14.	Alvarez & Marsal North America, LLC – Advisor to FOMB –	7992 / 607	02/01/2019 -		
	HTA	(17-3567)	05/31/2019		
15.	Bennazar, Garcia & Milian, C.S.P. – Puerto Rico Counsel for	7972	02/01/2019 -		
	the Official Committee of Retired Employees		05/31/2019		
16.	Ileana C. Cardona Fernandez – Puerto Rico Local Conflicts	8204	02/01/2019 -		
	Counsel to Special Claims Committee		05/31/2019		
17.	Casillas, Santiago & Torres, LLC – Puerto Rico Counsel to	8011	02/01/2019 -		
	the Official Committee of Unsecured Creditors		05/31/2019		
18.	Estrella, LLC – Puerto Rico Counsel to Special Claims	8295	02/01/2019 -		
	Committee		05/31/2019		

19.	Filsinger Energy Partners, Inc. – Chief Financial Advisor to	7987 / 1462	02/01/2019 -
	PREPA	(17-4780)	05/31/2019
20.	FTI Consulting, Inc. – Financial Advisor to the Official	7970	02/01/2019 -
	Committee of Retired Employees		05/31/2019
21.	Genovese Joblove and Battista, P.A. – Litigation Counsel to	7994	04/16/2019 —
	the Official Committee of Unsecured Creditors		05/31/2019
22.	Gierebolini & Carroll Law Offices, PSC – Counsel for FOMB	8016	02/01/2019 -
			05/31/2019
23.	Marchand ICS Group – Information Agent to the Official	7978	02/01/2019 -
	Committee of Retired Employee		05/31/2019
24.	McKinsey & Company, Inc. – Consulting Services Provider	8008	02/01/2019 -
	to FOMB – Commonwealth		05/31/2019
25.	McKinsey & Company, Inc. – Consulting Services Provider	8009 / 610	02/01/2019 -
	to FOMB – HTA	(17-3567)	05/31/2019
26.	McKinsey & Company, Inc. – Consulting Services Provider	8010 / 1463	02/01/2019 -
	to FOMB – PREPA	(17-4780)	05/31/2019
27.	Munger, Tolles & Olson LLP – Counsel to the FOMB	7989	08/01 - 3,2018
			10/01/2018 -
			05/31/2019
28.	Norton Rose Fulbright US LLP – Special Debt Financing	7959 / 1460	02/01/2019 -
	Counsel for PREPA	(17-4780)	05/31/2019
29.	Phoenix Management Services, LLC – Financial Advisor to	7977	02/04/2019 —
	the Mediation Team		06/02/2019
30.	Segal Consulting – Actuaries and Consultants to the Official	7976	02/01/2019 —
	Committee of Retired Employees		05/31/2019

# **Related Documents:**

A. Fee Examiner's Report on Uncontested Professional Fee Matters for Consideration in Connection with the October 30, 2019 Omnibus Hearing [Case No. 17-3283, ECF No. 8934]

Status: This matter is going forward.

Estimated Time Required: 5 minutes.

# III. <u>UNCONTESTED MATTERS:</u>

1. <u>Debtor's Individual Objection to Claim of Madeline Dosal Milán (Claim No. 60246).</u> The Commonwealth of Puerto Rico's Individual Objection to Claim of Madeline Dosal Milán (Claim No. 60246) [Case No. 17-3283, ECF No. 8692]

<u>Description</u>: The Commonwealth of Puerto Rico's individual objection to claim of Madeline Dosal Milán (Claim No. 60246) as incorrectly asserted against the Commonwealth and should be reclassified to be asserted against the Puerto Rico Electric Power Authority.

Objection Deadline: October 15, 2019 at 4:00 p.m. (Atlantic Standard Time).

## Responses:

A. None.

Reply, Joinder & Statement Deadlines: October 22, 2019 at 4:00 p.m. (Atlantic Standard Time) for all parties other than the Debtors or Statutory Committees and October 23 at 4:00 p.m. (Atlantic Standard Time) for Debtors and Statutory Committees.

# Replies, Joinders & Statements:

A. None.

#### Related Documents:

A. None.

Status: This matter is going forward.

Estimated Time Required: 5 minutes.

2. <u>Sixty-Eighth Omnibus Objection to Claims.</u> The Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of Puerto Rico's Sixty-Eighth Omnibus Objection (Non- Substantive) to Duplicate Claims [Case No. 17-3283, ECF No. 8693]

<u>Description</u>: The Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of Puerto Rico's sixty-eighth omnibus objection (non-substantive) to duplicate claims.

Objection Deadline: October 15, 2019 at 4:00 p.m. (Atlantic Standard Time).

#### Responses:

A. None.

Reply, Joinder & Statement Deadlines: October 22, 2019 at 4:00 p.m. (Atlantic Standard Time) for all parties other than the Debtors or Statutory Committees and October 23 at 4:00 p.m. (Atlantic Standard Time) for Debtors and Statutory Committees.

# Replies, Joinders & Statements:

A. None.

#### Related Documents:

A. None.

Status: This matter is going forward.

Estimated Time Required: 5 minutes.

3. <u>Seventieth Omnibus Objection to Claims.</u> The Commonwealth of Puerto Rico's Seventieth Omnibus Objection (Substantive) to COFINA Bondholder Claims [Case No. 17-3283, ECF No. 8696]

<u>Description</u>: The Commonwealth of Puerto Rico's seventieth omnibus objection (substantive) to COFINA bondholder claims.

Objection Deadline: October 15, 2019 at 4:00 p.m. (Atlantic Standard Time).

# Responses:

A. None.

Reply, Joinder & Statement Deadlines: October 22, 2019 at 4:00 p.m. (Atlantic Standard Time) for all parties other than the Debtors or Statutory Committees and October 23 at 4:00 p.m. (Atlantic Standard Time) for Debtors and Statutory Committees.

# Replies, Joinders & Statements:

A. None

#### Related Documents:

A. None.

Status: This matter is going forward.

Estimated Time Required: 5 minutes.

4. <u>Seventy-First Omnibus Objection to Claims.</u> The Commonwealth of Puerto Rico's Seventy-First Omnibus Objection (Substantive) to GDB Bondholder claims [Case No. 17-3283, ECF No. 8697]

<u>Description</u>: The Commonwealth of Puerto Rico's seventy-first omnibus objection (substantive) to GDB bondholder claims.

Objection Deadline: October 15, 2019 at 4:00 p.m. (Atlantic Standard Time).

# Responses:

A. None.

Reply, Joinder & Statement Deadlines: October 22, 2019 at 4:00 p.m. (Atlantic Standard Time) for all parties other than the Debtors or Statutory Committees and October 23 at 4:00 p.m. (Atlantic Standard Time) for Debtors and Statutory Committees.

# Replies, Joinders & Statements:

A. None

# **Related Documents:**

A. None.

Status: This matter is going forward.

Estimated Time Required: 5 minutes.

 Seventy-Fourth Omnibus Objection to Claims. The Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico's Seventy-Fourth Omnibus Objection (Substantive) to Claims Based on Investments in Mutual Funds [Case No. 17-3283, ECF No. 8701]

<u>Description</u>: The Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico's seventy-fourth omnibus objection (substantive) to claims based on investments in mutual funds.

Objection Deadline: October 15, 2019 at 4:00 p.m. (Atlantic Standard Time).

## Responses:

A. None.

Reply, Joinder & Statement Deadlines: October 22, 2019 at 4:00 p.m. (Atlantic Standard Time) for all parties other than the Debtors or Statutory Committees and October 23 at 4:00 p.m. (Atlantic Standard Time) for Debtors and Statutory Committees.

# Replies, Joinders & Statements:

A. None

#### Related Documents:

A. None.

Status: This matter is going forward.

Estimated Time Required: 5 minutes

# **IV. CONTESTED MATTERS:**

1. <u>Debtors' Motion Authorizing Administrative Reconciliation of Certain Claims.</u> The Commonwealth of Puerto Rico, the Puerto Rico Highways and Transportation Authority, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, the Puerto Rico Electric Power Authority, and the Puerto Rico Public Buildings Authority's Motion for Entry of an Order (A) Authorizing Administrative Reconciliation of Certain Claims, (B) Approving Additional Form of Notice, and (C) Granting Related Relief [Case No. 17-3283, ECF No. 8827]

<u>Description</u>: The Debtors' motion (a) authorizing administrative reconciliation of certain claims, (b) approving additional form of notice, and (c) related relief.

Objection Deadline: October 15 at 4:00 p.m. (Atlantic Standard Time).

## Responses:

A. Limited Objection of Official Committee of Unsecured Creditors to Debtors' Motion for Entry of an Order (A) Authorizing Administrative Reconciliation of Certain Claims, (B) Approving Additional Form of Notice, and (C) Granting Related Relief [Case No. 17-3283, ECF No. 8893]

Reply, Joinder & Statement Deadlines: October 22, 2019 at 4:00 p.m. (Atlantic Standard Time) for all parties other than the Debtors or Statutory Committees and October 23, 2019 at 4:00 p.m. (Atlantic Standard Time) for Debtors and Statutory Committees.

# Replies, Joinders & Statements:

A. Debtors' Reply in Support of their Motion for Entry of an Order (A) Authorizing Administrative Reconciliation of Certain Claims, (B) Approving Additional Form of Notice, and (C) Granting Related Relief [Case No. 17-3283, ECF No. 8930]

# Related Documents:

- A. Order Directing Supplemental Briefing regarding Motion for Entry of an Order (A) Authorizing Administrative Reconciliation of Certain Claims, (B) Approving Additional Form of Notice, and (C) Granting Related Relief [Case No. 17-3283, ECF No. 8845]
- B. Supplemental Brief of the Debtors in Support of Motion for Entry of an Order (A) Authorizing Administrative Reconciliation of Certain Claims, (B) Approving Additional Form of Notice, and (C) Granting Related Relief Case No. 17-3283, ECF No. 8876]

Status: This matter is going forward.

Estimated Time Required: 15 minutes.

2. <u>Sixty-Fourth Omnibus Objection to Claims.</u> The Commonwealth of Puerto Rico's Sixty-Fourth Omnibus Objection (Substantive) to Claims Based on Investments in Mutual Funds [Case No. 17-3283, ECF No. 8297]

<u>Description</u>: The Commonwealth of Puerto Rico's sixty-fourth omnibus objection (substantive) to claims based on investments in mutual funds.

Objection Deadline: August 27, 2019 at 4:00 p.m. (Atlantic Standard Time).

#### Responses:

A. Response in Opposition to Debtor's Sixty-Fourth Omnibus Objection to Claims Based on Investments in Mutual Funds [Case No. 17-3283, ECF No. 8563]

Reply, Joinder & Statement Deadlines: September 3, 2019 at 4:00 p.m. (Atlantic Standard Time) for all parties other than the Debtors or Statutory Committees and September 4, 2019 at 4:00 p.m. (Atlantic Standard Time) for Debtors and Statutory Committees.

# Replies, Joinders & Statements:

- A. Omnibus Reply of the Commonwealth of Puerto Rico to Responses Filed to Sixty-Fourth Omnibus Objection (Substantive) to Claims Based on Investments in Mutual Funds [Case No. 17-3283, ECF No. 8608]
- B. Second Omnibus Reply of the Commonwealth of Puerto Rico to Responses Filed to Sixty-Fourth Omnibus Objection (Substantive) to Claims Based on Investments in Mutual Funds [Case No. 17-3283, ECF No. 8646]
- C. Supplement to Reply of the Commonwealth of Puerto Rico to Responses Filed to Sixty-Fourth Omnibus Objection (Substantive) to Claims Based on Investment in Mutual Funds [Case No. 17-3283, ECF No. 8919]

#### Related Documents:

A. Motion to Inform Filing of Amended Proof of Claim No. 1091-2 (Claim No. 17144) as it Relates to the Sixty-Fourth Omnibus Objection to Claims (Dkt. No. 8297) and the Responses Thereto (Dkt. No. 8563) [Case No. 17-3283, ECF No. 8828]

Status: This matter is going forward.

Estimated Time Required: 15 minutes.

3. <u>Sixty-Ninth Omnibus Objection to Claims.</u> The Commonwealth of Puerto Rico and Employees Retirement System of the Government of Commonwealth of Puerto Rico's Sixty-Ninth Omnibus Objection (Non-Substantive) to Satisfied Claims [Case No. 17-3283, ECF No. 8695]

<u>Description</u>: The Commonwealth of Puerto Rico and Employees Retirement System of the Government of the Commonwealth of Puerto Rico's sixty-ninth omnibus objection (non-substantive) to satisfied claims.

Objection Deadline: October 15, 2019 at 4:00 p.m. (Atlantic Standard Time).

#### Responses:

A. Response to Sixty-Ninth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Satisfied Claims [Case No. 17-3283, ECF No. 8780]

Reply, Joinder & Statement Deadlines: October 22, 2019 at 4:00 p.m. (Atlantic Standard Time) for all parties other than the Debtors or Statutory Committees and October 23 at 4:00 p.m. (Atlantic Standard Time) for Debtors and Statutory Committees.

# Replies, Joinders & Statements:

A. Reply of the Commonwealth of Puerto Rico to Response Filed by Ponce Real Estate Corporation to Sixty-Ninth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Satisfied Claims [Case No. 17-3283, ECF No. 8929]

# Related Documents:

A. None.

Status: This matter is going forward.

Estimated Time Required: 15 minutes.

4. <u>Seventy-Second Omnibus Objection to Claims.</u> The Commonwealth of Puerto Rico's Seventy-Second Omnibus Objection (Substantive) to Bondholder Claims Asserting Amounts for which the Commonwealth is not Liable [Case No. 17-3283, ECF No. 8698]

<u>Description</u>: The Commonwealth of Puerto Rico's seventy-second omnibus objection (substantive) to bondholder claims asserting amounts for which the Commonwealth is not liable.

Objection Deadline: October 15, 2019 at 4:00 p.m. (Atlantic Standard Time).

# Responses:

A. Response to Commonwealth of Puerto Rico's Seventy-Second Omnibus Objection (Substantive) to Bondholder Claims Asserting Amounts for which the Commonwealth is not Liable, filed by JRF Gold Distributors, Inc. [Case No. 17-3283, ECF No. 8812]

Reply, Joinder & Statement Deadlines: October 22, 2019 at 4:00 p.m. (Atlantic Standard Time) for all parties other than the Debtors or Statutory Committees and October 23 at 4:00 p.m. (Atlantic Standard Time) for Debtors and Statutory Committees.

#### Replies, Joinders & Statements:

A. Reply of the Commonwealth of Puerto Rico to Response Filed by JFR Gold Distributors Inc. to Seventy-Second Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Bondholder Claims Asserting Amounts for which the Commonwealth is not Liable [Case No. 17-3283, ECF No. 8924]

# Related Documents:

A. None.

Status: This matter is going forward.

Estimated Time Required: 15 minutes.

5. <u>Seventy-Third Omnibus Objection to Claims.</u> The Commonwealth of Puerto Rico's Seventy-Third Omnibus Objection (Substantive) to Bondholder Claims Asserting Amounts for Which the Commonwealth is not Liable [Case No. 17-3283, ECF No. 8699]

<u>Description</u>: The Commonwealth of Puerto Rico's seventy-third omnibus objection (substantive) to bondholder claims asserting amounts for which the Commonwealth is not liable.

Objection Deadline: October 15, 2019 at 4:00 p.m. (Atlantic Standard Time).

# Responses:

A. Response of Bondholder Patricia Moscoso to Seventy-Third Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Bondholders Claims Asserting Amounts for which the Commonwealth is not Liable (Dkt. No. 8699) [Case No. 17-3283, ECF No. 8855]

Reply, Joinder & Statement Deadlines: October 22, 2019 at 4:00 p.m. (Atlantic Standard Time) for all parties other than the Debtors or Statutory Committees and October 23 at 4:00 p.m. (Atlantic Standard Time) for Debtors and Statutory Committees.

# Replies, Joinders & Statements:

A. Reply of the Commonwealth of Puerto Rico to Response Filed by Patricia Moscoso to Seventy-Third Omnibus Objection (Substantive) to Bondholder Claims Asserting Amounts for which the Commonwealth is not Liable [Case No. 17-3283, ECF No. 8928]

#### Related Documents:

A. None.

Status: This matter is going forward.

**Estimated Time Required:** 15 minutes

# V. ADJOURNED MATTERS:

1. <u>AAFAF's Objection to Claim of the United States Department of the Treasury/Internal Revenue Service.</u> Puerto Rico Fiscal Agency and Financial Advisory Authority's objection to Proofs of Claim of the United States Department of the Treasury/Internal Revenue Service (Claims Nos. 168648 and 16885) [Case No. 17-3283, ECF No. 7419, Case No. 17-3284, ECF No. 643]

<u>Description</u>: Puerto Rico Fiscal Agency and Financial Advisory Authority's objection to proofs of claim of the United States Department of the Treasury/Internal Revenue Service (Claims Nos. 168648 and 16885) filed against the Puerto Rico Sales Tax Financing Corporation.

Objection Deadline: August 9, 2019 at 4:00 p.m. (Atlantic Standard Time).

# Responses:

A. None.

Reply, Joinder & Statement Deadlines: September 4, 2019 at 4:00 p.m. (Atlantic Standard Time).

## Replies, Joinders & Statements:

A. None

# Related Documents:

A. Stipulation and Agreed Order (A) Withdrawing Proofs of Claim of the United States Department of the Treasury/Internal Revenue Service (Claim Nos. 168648 and 168885); (B) Deeming Previously Filed Objection to Apply to Amended IRS Proof of Claim (Claim No. 169423); (C) Extending Deadline to Respond to the Objection; and (D) Adjourning Hearing to Consider the Objection [Case No. 17-3283, ECF No. 7927, Case No. 17-3284, ECF No. 662]

Status: This matter has been adjourned to the December 11, 2019 omnibus hearing.

Estimated Time Required: N/A

# 2. <u>AMPR's Motion for Relief from Stay.</u> Motion for Relief from Automatic Stay [Case No. 17-3283, ECF No. 3914]

<u>Description</u>: Asociación de Maestros de Puerto Rico, and its Union, Asociación de Maestros de Puerto Rico-Local Sindical, both of which are affiliates of the American Federation of Teachers, seek relief from the automatic stay to pursue action against the Department of Education of the Commonwealth, the Secretary of the Department of Education of the Commonwealth, Julia Keleher in her official capacity, and the Commonwealth of Puerto Rico. The action seeks a declaratory judgment concerning causes of action for breach and/or impairment of contractual and vested property rights.

Objection Deadline: October 27, 2018 at 4:00 p.m. (Atlantic Standard Time).

## Responses:

A. Objection of the Commonwealth to Motion for Relief from Automatic Stay filed by Asociación de Maestros de Puerto Rico, and its Union, Asociación de Maestros de Puerto Rico-Local Sindical [Case No. 17-3283, ECF No. 4038]

Reply, Joinder & Statement Deadlines: October 19, 2018 at 4:00 p.m. (Atlantic Standard Time).

#### Replies, Joinders & Statements:

A. Movants' Reply to Objection of the Commonwealth to Motion for Relief from Automatic Stay Filed by AMPR and AMPR-LS [Case No. 17-3283, ECF No. 4071]

#### Related Documents:

- A. Order Scheduling Briefing of Motion for Relief from Automatic Stay [Case No. 17-3283, ECF No. 3916]
- B. Urgent Joint Motion for Extension of Deadlines [Case No. 17-3283, ECF No. 3960]
- C. Order Extending Deadlines under Order Scheduling Briefing of Motion for Relief from Automatic Stay [Case No. 17-3283, ECF No. 3966]
- D. Unopposed Motion of Commonwealth of Puerto Rico for Leave to File Sur-Reply to Movants' Reply to Objection of the Commonwealth to Motion for Relief from Automatic Stay Filed by AMPR and AMPR-LS [Case No. 17-3283, ECF No. 4107]
- E. Order Granting Unopposed Motion of Commonwealth of Puerto Rico for Leave to File Sur-Reply [Case No. 17-3283, ECF No. 4449]
- F. Joint Informative Motion Regarding Hearing on Motion for Relief from Stay filed by Asociación de Maestros de Puerto Rico [Case No. 17-3283, ECF No. 4941]
- G. Joint Status Report Regarding Motion for Relief from Stay Filed by Asociación de Maestros de Puerto Rico [Case No. 17-3283, ECF No. 8075]

Status: This matter has been adjourned to the March 4, 2020 omnibus hearing.

Estimated Time Required: N/A

3. <u>UBS Financial Services of Puerto Rico's Motion for Relief from Stay.</u> Motion of UBS Financial Services Incorporated of Puerto Rico for Relief from the Automatic Stay [Case No. 17-3283, ECF No. 8823, Case No. 17-3566, ECF No. 677]

<u>Description</u>: UBS Financial Services Incorporated of Puerto Rico's motion for relief from the automatic stay to assert counterclaims for breach of contract and indemnification against an ongoing action filed by ERS against UBS under the caption *Administración de los Sistemas de Retiro de los Empleados del Gobierno y la Judicatura de Puerto Rico v. UBS Fin. Servs. Inc. of Puerto Rico*, Civ. No. KAC-2011-1067.

Objection Deadline: November 26, 2019 at 4:00 p.m. (Atlantic Standard Time).

#### Responses:

A. None.

Reply, Joinder & Statement Deadlines: December 6, 2019 at 4:00 p.m. (Atlantic Standard Time).

Replies, Joinders & Statements:

A. None.

Related Documents:

A. Informative Motion Regarding Adjournment of Hearing on, and Extension of Deadline to Object to, the Motion of USB Financial Services Incorporated of Puerto Rico for Relief from the Automatic Stay [Case No. 17-3283, ECF No. 8923, Case No. 17-3566, ECF No. 684]

Status: This matter has been adjourned to the December 11, 2019 omnibus hearing.

Estimated Time Required: N/A

4. Ambac's Motion to Compel Compliance with Orders Authorizing 2004 Examinations. Ambac Assurance Corporation's Motion to Compel Compliance with the Court's December 15, 2017 and February 26, 2018 Orders regarding the Urgent Renewed Joint Motion of the Ad Hoc Group of General Obligation Bondholders, Ambac Assurance Corporation, Assured Guaranty Corp., Assured Guaranty Municipal Corp., the Mutual Fund Group, and National Public Finance Guarantee Corporation for Order Authorizing Rule 2004 Examination [Case No. 17-3283, ECF No. 7505]

<u>Description</u>: Ambac Assurance Corporation's motion to compel the Commonwealth of Puerto Rico, AAFAF, and the Financial Oversight and Management Board for Puerto Rico to comply with the Court's orders of December 15, 2017 and February 26, 2018 as they pertain to requests for information regarding the Commonwealth's pension liabilities, as set forth in the Rule 2004 motions dated September 12, 2017 (ECF. No. 1283) and November 28, 2017 (ECF. No. 1870).

Objection Deadline: July 9, 2019 at 4:00 p.m. (Atlantic Standard Time).

# Responses:

A. Respondents' Omnibus Opposition to Ambac Assurance Corporation's Motion to Compel [ECF No. 7505] and Ambac Assurance Corporation's Pension Motion [ECF No. 7507] [Case No. 17-3283, ECF No. 7895]

Reply, Joinder & Statement Deadlines: July 16, 2019 at 4:00 p.m. (Atlantic Standard Time) for all parties other than the Debtors or Statutory Committees and July 17, 2019 at 4:00 p.m. (Atlantic Standard Time) for Debtors and Statutory Committees.

# Replies, Joinders & Statements:

- A. Joinder of Ad Hoc Group of Constitutional Debtholders to Ambac Assurance Corporation's Requests for Rule 2004 Discovery [Case No. 17-3283, ECF No. 7531]
- B. Joinder of Assured Guaranty Corp. and Assured Guaranty Municipal Corp. to Ambac Assurance Corporation's Requests for Rule 2004 Discovery [Case No. 17-3283, ECF No. 7588]
- C. Joinder of Financial Guaranty Insurance Company to Ambac Assurance Corporation's Motion to Compel Compliance with the Court's December 15, 2017 and February 26, 2018 Orders regarding the Urgent Renewed Joint Motion of the Ad Hoc Group of General Obligation Bondholders, Ambac Assurance Corporation,

- Assured Guaranty Corp., Assured Guaranty Municipal Corp., the Mutual Fund Group, and National Public Finance Guarantee Corporation for Order Authorizing Rule 2004 Examination [Dkt. No. 7505] [Case No. 17-3283, ECF No. 7674]
- D. Joinder of the Ad Hoc Group of General Obligation Bondholders to Ambac Assurance Corporation's Requests for Rule 2004 Discovery [Case No. 17-3283, ECF No. 7714]
- E. Limited Joinder of Official Committee of Unsecured Creditors in Ambac Assurance Corporation's Motion to Compel Seeking Discovery Pursuant to Rule 2004 [Dkt. No. 7505] [Case No. 17-3283, ECF No. 7883]

# Related Documents:

- A. Order Adjourning Hearing on Pension Discovery Motions [Case No. 17-3283, ECF No. 8447]
- B. Second Joint Status Report of Movant Ambac Assurance Corporation and Respondents the Financial Oversight and Management Board for Puerto Rico, the Commonwealth of Puerto Rico, and the Puerto Rico Fiscal Agency and Financial Advisory Authority With Respect to The Pensions Discovery Motions [Case No. 17-3283, ECF No. 8633]
- C. Joint Urgent Motion by Ambac Assurance Corporation, the Financial Oversight and Management Board for Puerto Rico, the Commonwealth of Puerto Rico, and the Puerto Rico Fiscal Agency and Financial Advisory Authority, Seeking an Order Granting an Adjournment of the Hearing of the Pensions Discovery Motions [Case No. 17-3283, ECF No. 8634]
- D. Order Adjourning Hearing on Pensions Discovery Motions [Case No. 17-3283, ECF No. 8638]
- E. Third Joint Status Report of Movant Ambac Assurance Corporation and Respondents the Financial Oversight and Management Board for Puerto Rico, the Commonwealth of Puerto Rico, and the Puerto Rico Fiscal Agency and Financial Advisory Authority With Respect to the Pensions Discovery Motions [Case No. 17-3283, ECF No. 8996]
- F. Order Adjourning Hearing on Pensions Discovery Motions [Case No. 17-3283, ECF No. 9006]

Status: This matter has been adjourned to the December 11, 2019 omnibus hearing.

Estimated Time Required: N/A

5. Ambac's Motion for Order Authorizing 2004 Discovery Concerning Pension Liabilities. Ambac Assurance Corporation's Motion for Entry of Order Authorizing Discovery Under Bankruptcy Rule 2004 Concerning Pension Liabilities [Case No. 17-3283,

ECF No. 7507]

<u>Description</u>: Ambac Assurance Corporation's motion for entry of order authorizing discovery of the Financial Oversight and Management Board for Puerto Rico as representative of the Commonwealth of Puerto Rico, the Puerto Rico Fiscal Agency and Financial Advisory Authority, and the Commonwealth of Puerto Rico under Bankruptcy Rule 2004 concerning pension liabilities.

Objection Deadline: July 9, 2019 at 4:00 p.m. (Atlantic Standard Time).

# Responses:

A. Respondents' Omnibus Opposition to Ambac Assurance Corporation's Motion to Compel [ECF No. 7505] and Ambac Assurance Corporation's Pension Motion [ECF No. 7507] [Case No. 17-3283, ECF No. 7895]

Reply, Joinder & Statement Deadlines: July 16, 2019 at 4:00 p.m. (Atlantic Standard Time) for all parties other than the Debtors or Statutory Committees and July 17, 2019 at 4:00 p.m. (Atlantic Standard Time) for Debtors and Statutory Committees.

# Replies, Joinders & Statements:

- A. Joinder of Ad Hoc Group of Constitutional Debtholders to Ambac Assurance Corporation's Requests for Rule 2004 Discovery [Case No. 17-3283, ECF No. 7531]
- B. Joinder of Assured Guaranty Corp. and Assured Guaranty Municipal Corp. to Ambac Assurance Corporation's Requests for Rule 2004 Discovery [Case No. 17-3283, ECF No. 7588]
- C. Joinder of Financial Guaranty Insurance Company to Ambac Assurance Corporation's Motion for Entry of Order Authorizing Discovery Under Bankruptcy Rule 2004 Concerning Pension Liabilities [Dkt. No. 7507] Discovery [Case No. 17-3283, ECF No. 7675]
- D. Joinder of the Ad Hoc Group of General Obligation Bondholders to Ambac Assurance Corporation's Requests for Rule 2004 Discovery [Case No. 17-3283, ECF No. 7714]
- E. Limited Joinder of Official Committee of Unsecured Creditors in Ambac Assurance Corporation's Motion Regarding Pension Liabilities Seeking Discovery Pursuant to Rule 2004 [Dkt. No. 7507] [Case No. 17-3283, ECF No. 7880]
- F. Ambac Assurance Corporation's Omnibus Reply in Further Support of the Pensions Discovery Motions [Case No. 17-3283, ECF No. 8230]

#### Related Documents:

- A. Order Adjourning Hearing on Pension Discovery Motions [Case No. 17-3283, ECF No. 8447]
- B. Second Joint Status Report of Movant Ambac Assurance Corporation and Respondents the Financial Oversight and Management Board for Puerto Rico, the Commonwealth of Puerto Rico, and the Puerto Rico Fiscal Agency and Financial

- Advisory Authority With Respect to The Pensions Discovery Motions [Case No. 17-3283, ECF No. 8633]
- C. Joint Urgent Motion by Ambac Assurance Corporation, the Financial Oversight and Management Board for Puerto Rico, the Commonwealth of Puerto Rico, and the Puerto Rico Fiscal Agency and Financial Advisory Authority, Seeking an Order Granting an Adjournment of the Hearing of the Pensions Discovery Motions [Case No. 17-3283, ECF No. 8634]
- D. Order Adjourning Hearing on Pensions Discovery Motions [Case No. 17-3283, ECF No. 8638]
- E. Third Joint Status Report of Movant Ambac Assurance Corporation and Respondents the Financial Oversight and Management Board for Puerto Rico, the Commonwealth of Puerto Rico, and the Puerto Rico Fiscal Agency and Financial Advisory Authority With Respect to the Pensions Discovery Motions [Case No. 17-3283, ECF No. 8996]
- F. Order Adjourning Hearing on Pensions Discovery Motions [Case No. 17-3283, ECF No. 9006]

Status: This matter has been adjourned to the December 11, 2019 omnibus hearing.

Estimated Time Required: N/A

6. Fee Examiner's Limited Objection to the Amended First Interim Fee Application of Duff & Phelps LLC. Fee Examiner's Limited Objection to the Amended First Interim Application of Duff & Phelps LLC for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred as Independent Forensic Analysis Team to the Financial Oversight and Management Board for Puerto Rico, as Representative of Debtor, the Commonwealth of Puerto Rico for the Period of November 1, 2018 through January 31, 2019 [Case No. 17-3283, ECF No. 8862]

<u>Description</u>: The Fee Examiner's limited objection to the amended first interim application of Duff & Phelps LLC for allowance of compensation for services rendered and reimbursement of expenses incurred as independent forensic analysis team to the Financial Oversight and Management Board for Puerto Rico, as Representative of Debtor, the Commonwealth of Puerto Rico for the period of November 1, 2018 through January 31, 2019

Objection Deadline: N/A

## Responses:

A. Reply of Duff & Phelps LLC to Fee Examiner's Limited Objections (Doc. No. 8862) to Amended First Application for Allowance of Compensation and Reimbursement of Expenses for Period November 1, 2018 through January 31, 2019 [Case No. 17-3283, ECF No. 8915]

## Replies, Joinders & Statements:

A. None

## Related Documents:

- A. Amended First Interim Application of Duff & Phelps LLC for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred as Independent Forensic Analysis Team to the Financial Oversight and Management Board for Puerto Rico, as Representative of Debtor, the Commonwealth of Puerto Rico for the Period of November 1, 2018 through January 31, 2019 [Case No. 17-3283, ECF No. 8450]
- B. Motion Submitting Supporting Declaration to Fee Examiner's Limited Objection to the Amended First Interim Application of Duff & Phelps LLC for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred as Independent Forensic Analysis Team to the Financial Oversight and Management Board for Puerto Rico, as Representative of Debtor, the Commonwealth of Puerto Rico for the Period of November 1, 2018 through January 31, 2019 [Case No. 17-3283, ECF No. 8866]
- C. Order Setting Deadline for Joint Status Report by Fee Examiner and Duff & Phelps [Case No. 17-3283, ECF No. 8945]
- D. Order Adjourning Hearing and Setting Amended Deadline for Joint Status Report by Fee Examiner and Duff & Phelps [Case No. 17-3283, ECF No. 9008]

Status: This matter has been adjourned to the December 11, 2019 omnibus hearing.

Estimated Time Required: N/A

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Dated: October 28, 2019 San Juan, Puerto Rico

# Respectfully submitted,

# /s/ Martin J. Bienenstock

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